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10 The Honorable Richard A. Jones  
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**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

JESSICA BENTON, SHELBY BRYANT,  
ANNE MARIE CAVANAUGH, ALYSSA  
GARRISON, AND CLARE THOMAS

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant

Case No. 2:20-cv-01174-RAJ

**PRAECIPE TO ATTACH**

**TO THE CLERK OF THE COURT:**

You will please find corrected signature pages for the following:

- Dkt. 32: Declaration of Jessica Benton;
- Dkt. 33: Declaration of Shelby Bryant;
- Dkt. 34: Declaration of Annemarie Cavanaugh;
- Dkt. 35: Declaration of Alyssa Garrison;
- Dkt. 37: Declaration of Marcus Kulik;
- Dkt. 39: Declaration of Chris Rojas; and

PRAECIPE TO ATTACH - 1

2:20-cv-01174-RAJ

**SMITH LAW, LLC**  
4301 NE 4th St.  
PO Box 2767  
Renton, WA 98059  
Tel: (206) 715-4248  
Fax: (206) 900-2664

- Dkt. 41: Declaration of Keaton Slansky.

DATED this 6<sup>th</sup> day of October, 2020.

## SMITH LAW, LLC

By /s/ Talitha Hazelton  
Talitha Hazelton, WSBA No. 52460  
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*Attorney for Plaintiffs*

PRAECLYPE TO ATTACH - 2

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

I declare under penalty of perjury under the laws of the United States of America  
the foregoing is true and correct.

Dated this 6<sup>th</sup> day of October, 2020 at Seattle, Washington.

J. Talitha Hazelton

## CERTIFICATE OF SERVICE

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17. On September 7, 2020, I witnessed via livestream SPD officers respond to a Labor Day march to the Seattle Police Officer's Guild office. Within minutes of arriving at the office, SPD officers converged on protestors, using crowd control weapons.

- a. The march was very calm before SPD engaged, there were even young children in attendance.

18. After observing this response, I do not feel safe attending future protests until SPD is enjoined from using such extreme force against protestors without provocation.

19. I recognize that protests will continue to occur as they have been for months. Especially as the election approaches, these protests against police brutality will likely increase. I have identified the following protests that I would like to be able to attend, however I am not sure that I will feel safe enough to participate.

a. Recurring Protests:

- i. Every Day Morning Marches, Monday-Friday at 9:00 AM, various locations
- ii. Every Day Evening Marches, Monday-Friday at 7:00 PM, various locations
- iii. Black Indigenous Coalition March, Fridays at 5:00 PM, Capitol Hill

b. Upcoming protests can be found at: [tinyurl.com/seattleBLMcalendar](http://tinyurl.com/seattleBLMcalendar).

20. I fear for my safety in attending other events such as community gatherings and vigils, even if they do not typically garner police presence, because SPD has chosen to treat all of these events as riots.

21. Until SPD is enjoined from using chemical agents, projectile guns, or blast balls, I will not feel safe attending protests and will only continue attending protests if I can find and afford protective gear.

EXECUTED on this 26th day of September 2020 at Seattle, WA.

I declare under penalty of perjury under the laws of the United States and the State of Washington  
that the foregoing is true and correct.

 Benton

Jessica Bentom

DECLARATION OF JESSICA BENTON IN SUPPORT OF  
MOTION FOR PRELIMINARY INJUNCTION - 3

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iii. Black Indigenous Coalition March, Fridays at 5:00 PM, Capitol Hill

b. Upcoming protests can be found at: [tinyurl.com/seattleBLMcalendar](http://tinyurl.com/seattleBLMcalendar).

24. I also fear for my safety in attending other events such as community gatherings and vigils, even if they do not typically garner police presence, because SPD has chosen to treat all of these events as riots.

25. Until SPD is enjoined from using chemical agents, projectile guns, or blast balls, I will not feel safe attending protests/will only continue attending protests if I can find and afford protective gear.

EXECUTED on this 26<sup>th</sup> day of September 2020 at Seattle, WA.

I declare under penalty of perjury under the laws of the United States and the State of Washington  
that the foregoing is true and correct.



Shelby Bryant

**BRYANT DECLARATION IN SUPPORT OF MOTION  
FOR PRELIMINARY INJUNCTION - 4**

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1 16. After observing this response, I do not feel safe attending future protests until SPD is enjoined  
2 from using such extreme force against protestors without provocation.

3 17. I recognize that protests will continue to occur as they have been for months. Especially as the  
4 election approaches, these protests against police brutality will likely increase. I have identified  
5 the following protests that I would like to be able to attend, however I am not sure that I will  
6 feel safe enough to participate.

7 a. Recurring Protests:

8 i. Every Day Morning Marches, Monday-Friday at 9:00 AM, various locations  
9 ii. Every Day Evening Marches, Monday-Friday at 7:00 PM, various locations  
10 iii. Black Indigenous Coalition March, Fridays at 5:00 PM, Capitol Hill

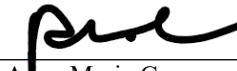
11 b. Upcoming protests can be found at: [tinyurl.com/seattleBLMcalendar](http://tinyurl.com/seattleBLMcalendar).

12 18. I also fear for my safety in attending other events such as community gatherings and vigils,  
13 even if they do not typically garner police presence, because SPD has chosen to treat all of  
14 these events as riots.

15 19. Until SPD is enjoined from using chemical agents, projectile guns, or blast balls, I will not feel  
16 safe attending protests.

17 EXECUTED on this 26<sup>th</sup> day of September 2020 at Seattle, WA.

18 I declare under penalty of perjury under the laws of the United States and the State of Washington  
19 that the foregoing is true and correct.

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Anne Marie Cavanaugh



1       3. On September 22, 2020, hours after the Seattle City Council vote to reduce  
2       funding of SPD, SPD officers responded to a group of protestors outside of the  
3       East Precinct on 12<sup>th</sup> Ave and Pine. I recorded a one minute and eight second  
4       video of this incident, which can be viewed on Twitter here:  
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6       <https://twitter.com/MarcusKulik/status/1308671251594977280?s=20>.

7       a. At 0:08, a blast ball is deployed.

8       EXECUTED on this 23rd day of September 2020 at Seattle, WA.

9       I declare under penalty of perjury under the laws of the United States and the State  
10      of Washington that the foregoing is true and correct.  
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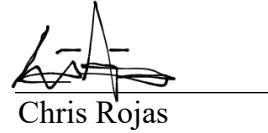
14      Marcus Kulik  
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DECLARATION OF MARCUS KULIK IN SUPPORT OF  
MOTION FOR PRELIMINARY INJUNCTION - 2

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1 I declare under penalty of perjury under the laws of the United States and the State  
2 of Washington that the foregoing is true and correct.  
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Chris Rojas

DECLARATION OF CHRIS ROJAS - 2

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6. Protective gear is absolutely necessary to attend any protest because of SPD's misuse of crowd control weapons.

EXECUTED on this 27th day of September 2020 at Seattle, WA.

I declare under penalty of perjury under the laws of the United States and the State of Washington  
that the foregoing is true and correct.



Keaton Slansky

DECLARATION OF KEATON SLANSKY IN SUPPORT  
OF MOTION FOR PRELIMINARY INJUNCTION - 2

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